

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

GINGER DAYTON, an individual;

Plaintiffs,

vs.

STEVEN CHAD TAGGART, et al.;

Defendants.

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**Civil Action No.:
3:07CV599-MEF**

DEFENDANTS REQUESTED VOIR DIRE QUESTIONS

1. Do any of you know, have you ever met or have you ever seen the Plaintiff in this case, Ginger Dayton. Ms. Dayton lives in Clayton, Alabama.

2. Do any of you know or met, to your knowledge, any relatives of Ginger Dayton?

3. Do any of you know or have you had any contact in your lifetime whatsoever with the attorney for Ginger Dayton in this case? He is Richard F. Horsley and he practices with the Firm of King, Horsley & Lyons, LLC, in Birmingham. Follow up.

4. As I told you, Mr. Horsley practices with the Firm of King, Horsley & Lyons, LLC in Birmingham. Have any of you had any contact with any of the lawyers who practice with Mr. Horsley's Firm? They are: Lawrence T. King, Champ Lyons, III, and Lindsey O'Dell.

5. Do any of you know anyone who works in any capacity for the Firm of King, Horsley & Lyons, LLC? If so, who?

6. Do any of you have an attorney in your immediate family? If so, what is their name, where does he or she practice and what type of practice is involved?

7. Do any of you have any legal training or experience whether it be law school, paralegal school, business law, commercial law or any similar education? If so, follow up.

8. Do any of you have any medical training or experience, whether it be medical school, nursing school, paramedic training, etc. If so, please follow up.

9. Do any of you now or have you ever worked for an attorney in any legal or quasi-legal position? Follow up.

10. Do any of your spouses or family members presently work for an attorney or law firm?

11. Have any of you had what I will simply classify as a bad experience with any tractor trailer or 18-wheeler during your lifetime? That is, have you had an experience with an 18-wheeler which left you concerned, upset or mad with the driver of the tractor trailer rig?

(a) Do you feel that you could still be completely fair and impartial to J. B. Hunt Transport, Inc., and its driver Steven Chad Taggart, in this case as concerns the claims made against it by Ginger Dayton and not allow this earlier experience concerning an 18-wheeler to in any way effect your legal decision in this case?

12. Do any of you feel that drivers of 18-wheelers or tractor trailer rigs are careless drivers or just not good drivers?

(a) Do you feel that you could still be completely fair and impartial to J. B. Hunt Transport, Inc., and its driver Steven Chad Taggart, in this case as concerns the claims against it Ginger Dayton and not allow this feeling to in any way effect your legal decision in this case?

13. Have any of you ever been employed as an over-the-road long-haul trucker?

14. Have any of you ever operated a tractor trailer rig?

15. Have any of you ever lost a family member in an automobile or truck accident? If so, was there a lawsuit filed?

16. The following persons may be called as witnesses in this case. Do any of you know or have you ever met or seen any of these individuals to your knowledge?

- (a) Ginger Dayton;
- (b) Annie Kimber;
- (c) John W. McKinney, III, CVE;
- (d) Dr. David Herrick;
- (e) Dr. Michael Davis; or
- (f) Dr. Wesley Marner.

17. Do any of you or any of your spouses have any accident reconstruction experiences as a law enforcement officer, in the military or as a claims adjuster in any other respects? If so, when, for whom and for what period of time and what were your duties?

18. Have any of you or your spouses in the last ten years held any public office (either local or state)?

19. J. B. Hunt Transport, Inc. is a corporation. Would that fact cause you any difficulty in being completely fair and impartial in deciding the issues in this case to the parties in this case; including Ginger Dayton,, J. B. Hunt Transport, Inc., and Steven Chad Taggart? If so, please indicate.

20. Is there any question in your background or experience that could cause you difficulty in being completely fair and impartial in deciding the issues in this case to the parties in this case, including Ginger Dayton, J. B. Hunt Transport, Inc. and Steven Chad Taggart. If so, please indicate.

21. The evidence in this case will indicate that Ginger Dayton may have injured her back or neck as a result of the accident in question. Is there any of you that feels that the natural sympathy that you and we all have for anyone suffering this type or more serious injuries would in any way influence the verdict you render in this case? Stated in another way, is there anyone on this Jury Panel who feels that they could not completely separate any natural sympathy or emotion that they feel for someone who is injured or killed from their duty as a juror, to fairly decide all the issues that are presented to them without being in any way influenced by sympathy, bias, passion or prejudice?

22. Have any of you or any of your relatives ever suffered a back or neck injury?

23. Have any of you or your family members ever applied for disability benefits?

24. Have any of you or your family members, either presently or in the past, received disability benefits?

25. Are any of you currently receiving unemployment benefits? Are any of your relatives receiving unemployment benefits? Have any of you or your relatives ever applied for unemployment benefits?

26. Have any of you or your relatives filed a claim for workers compensation insurance?

27. Do each of you agree that if you are selected to sit as a juror in this case to decide the issues that you will decide the case solely based upon the facts and the law as the Court instructs you completely separate from any sympathy, bias or prejudice you might have for any party in this suit, either the Plaintiff, or the Defendants, J. B. Hunt Transport, Inc., and Steven Chad Taggart?

28. Do any of you belong to a labor union?

\s\ Christopher S. Rodgers

Christopher S. Rodgers
S. A. Bradley Baker, III

OF COUNSEL:

HUIE, FERNAMBUCQ & STEWART, LLP
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Attorneys for the Defendant,
J. B. HUNT TRANSPORT, INC.

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

\s\ Christopher s. Rodgers

Of Counsel

COUNSEL OF RECORD:

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